

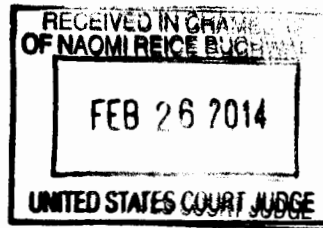
(718) 558-1113 **MEMO ENDORSED**



**Long Island Rail Road**

**MEMO ENDORSED**

February 26, 2014



Via Fax - (212) 805-7927

Judge Naomi Reice Buchwald  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

**Re: Bishop v. Long Island Rail Road  
13-CV-8049 (NRB)**

USDC SDNY  
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DATE FILED: 02/27/2014

Dear Justice Buchwald:

Pursuant to Your Honor's recent directive, the undersigned submits the following proposed discovery plan for your consideration with the consent of plaintiff's counsel:

1. Factual discovery to be completed by July 1, 2014;
2. Expert discovery to be completed by August 1, 2014;
3. Joint Pre-trial Order due on September 1, 2014.

*So Indured.*  
*Naomi Reice Buchwald,*  
*USDC*  
*February 26, 2014*

No dispositive motions are anticipated.

The parties have initiated and are proceeding with discovery in an amicable fashion to date.

Respectfully submitted,

*Christopher P. Yodice*  
Christopher P. Yodice  
Ass't Deputy General Counsel  
Torts & Administration

CPY/lj

cc: Marc T. Wietzke, Esq.

**MEMO ENDORSED**